

**Karen Warren**

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**From:** Christopher Madiou <chris@madioulaw.com>  
**Sent:** Friday, September 20, 2024 9:49 AM  
**To:** Karen Warren  
**Cc:** Budlow, Paul (USAMD)  
**Subject:** Status Report in U.S. v. Stavrakis, ELH-19-160

**CAUTION - EXTERNAL:**

Dear Judge Hollander,

The parties submit this status report on Mr. Stavrakis' motion for compassionate release. Since the last update, our defense expert has reviewed additional BOP medical records provided by AUSA Budlow, which include records received after his completion of chemo-radiation therapy at FMC Butner. At the moment, Mr. Stavrakis appears stable and does not currently have an end-of-life prognosis, which would require him to enter into hospice care immediately. However, the expert we engaged advised that he will not be able to accurately opine on whether the chemo-radiation treatment has eliminated the cancer until after a follow up PET scan is performed. Our expert has advised that reviewing the follow-up PET scan would give a more accurate view of Mr. Stavrakis' condition and what the next several years will look like as he battles this cancer, an issue that is central to our motion and directly relevant to whether "extraordinary and compelling reasons" exist for his resentencing pursuant to 18 U.S.C. 3582(C)(1)(A)(i). However, a PET scan cannot be done immediately after the chemo-radiation treatment or it will not be accurate--Mr. Stavrakis' next PET scan will be on or about January 12, 2025. Consequently, we ask for our next status report to be due on January 17, 2025. Counsel is in regular communication with Mr. Stavrakis and his family. If anything changes before January, or if his medical situation worsens, counsel will promptly notify AUSA Budlow and the Court.

Respectfully submitted,

Chris Madiou  
Counsel for Demetrios Stavrakis

*Next status  
report due by or before  
1/17/25. However,  
defense counsel  
must promptly notify  
the Court if defendant's  
condition worsens.  
ELH  
WSB  
9/20/24*